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June 7, 2021

BY ECF

Hon. Richard M. Berman, District Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Winder Casilla*, 20 Cr. 42 (RMB).

Dear Judge Berman:

As counsel to Winder Casilla, defendant herein, I request that he be permitted to re-locate to Reading, Pennsylvania. While on a visit with family there, he found he could obtain employment at an Amazon warehouse. He would like to remain there until sentencing and perhaps beyond, should the Court impose a non-jail sentence.

I have spoken with A.U.S.A. Jarrod Schaefer, who defers to Pretrial Services. Pretrial Services Officer Jonathan Lettieri does not object to Mr. Casilla remaining in Pennsylvania. Courtesy supervision will have to be arranged if he is permitted to remain in Reading.

I should note that, in my letter to the Court of June 2nd, I stated incorrectly that Mr. Casilla had "recently moved." In fact, he was in Reading on a visit, but with the hope of remaining there until sentencing, pending the Court's approval. I apologize for this inaccuracy and any confusion it caused.

Thank you for your attention to this request.

Very truly yours,

/s
Jesse M. Siegel

Application to relocate prior to sentence is
respectfully denied. Mr. Casilla may reapply
after the sentencing.

SO ORDERED:

Date: 6/7/21

Richard M. Berman

Richard M. Berman, U.S.D.J.